

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., *et al.*,¹) Case No. 01-01139 (JKF)
) (Jointly Administered)
Debtors.)

Re: Docket No. 5450 & 5646
6/21/04 Agenda Item No. 5

**CERTIFICATION OF COUNSEL REGARDING CONTINUATION ORDER
GRANTING THE RELIEF SOUGHT IN DEBTORS' THIRD OMNIBUS
OBJECTION TO CLAIMS (NON-SUBSTANTIVE) AS TO CONTINUED OBJECTIONS**

1. On April 14, 2004, the above-captioned debtors and debtors in possession (the "Debtors") filed their *Third Omnibus Objection to Claims* (the "Third Omnibus Objection") (Docket No. 5450).

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food & N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

2. On May 25, 2004, the Court entered an Order Granting the Relief Sought in Debtors' Third Omnibus Objection to Claims (the "Order") [Docket No. 5646]. The Order provides that the Debtors' objection to certain claims contained in the Third Omnibus Objection were continued to June 21, 2004 (the "Continued Disputed Claims").

3. A hearing on the Third Omnibus Objection was scheduled for June 21, 2004. The June 21, 2004 hearing was cancelled, as no contested matters were going forward.

4. In light of the June 21, 2004 hearing being cancelled, the Debtors have prepared a proposed order adjudicating the Continued Disputed Claims where the claimant has either not responded or has consented to the relief requested in the Third Omnibus Objection.

5. Attached hereto as Exhibit A, for the Court's consideration, is a proposed Continuation Order Granting the Relief Sought in the Third Omnibus Objection as to the Continued Disputed Claims (the "Proposed Continuation Order").

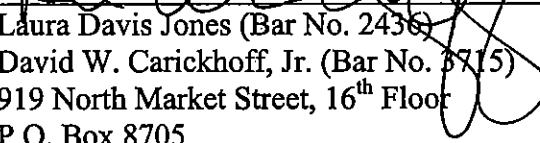
6. Accordingly, the Debtors respectfully request that the Court enter the Proposed Continuation Order at its earliest convenience.

Dated: June 30, 2004

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